

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

**Jerry Rodriguez**, on behalf of himself  
and others similarly situated,

Plaintiff,

v.

**Remy Coeytaux**,

Defendant.

Case No. 3:25-cv-225

**JOINT MOTION TO STAY DEFENDANT'S DEADLINE TO  
ANSWER PLAINTIFF'S COMPLAINT**

The defendant's deadline to answer the plaintiff's complaint is currently set for Monday, October 6, 2025. The parties jointly and respectfully move to stay the defendant's deadline to file his answer or motion to dismiss.

The parties are making this request because the plaintiff intends to amend his complaint in response to Texas's House Bill 7, which takes effect on December 4, 2025. It would therefore serve judicial economy for the Court to stay the defendant's deadline to file an answer or motion to dismiss until after the plaintiff amends his complaint in December of 2025, when Texas's House Bill 7 takes effect. The parties respectfully request that the Court postpone the defendant's deadline to file his answer or motion to dismiss until 30 days after the amended complaint is filed in December of 2025. A proposed order is attached.

Respectfully submitted.

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Dated: September 29, 2025

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## CERTIFICATE OF SERVICE

I certify that on September 29, 2025, I served this document through CM/ECF

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